

Response ID ANON-2W2V-QH58-Q

Submitted to **A Culture Strategy for Scotland**

Submitted on **2018-09-10 14:50:16**

A vision for culture in Scotland

1 What is your view of the Vision as set out above?

Support the vision

2 If you have any further comments on the Vision, please provide them below. What do you like, or dislike, or what would you change?

If you have any further comments on the Vision, please provide them below. What do you like, or dislike, or what would you change?:

Opening statement from BEFS (this is included at the end of the consultation in 'any other comments' – but will also be provided as a covering statement as part of the consultation process):

As well as consulting with members more widely BEFS has been working closely with Heritage Lottery Fund (HLF), Historic Environment Scotland (HES), the National Trust for Scotland (NTS), and Museums Galleries Scotland (MGS) in relation to our shared views on the Culture Strategy.

This collaboration has distilled several points that are of concern to all organisations and which have been discussed with some of the team responsible for the current Culture Strategy draft.

- Strategy document length – the document is lengthy & wide-ranging.

We appreciate the information, received from the Strategy Team when we met, that the next iteration will be substantially reduced. However, we can only respond to what is part of the current consultation, and as-such this concern remains.

- Inclusive approach – balance & recognition of all culture sectors/types needed throughout (in case study material and terminology)

Many aspects of culture play key roles in the document but they are not all represented equitably. For the strategy to be championed by all it needs to reflect all aspects of cultural heritage. A definition of what the strategy means by 'culture' would be useful in helping to allay these concerns.

- Specific & detailed actions and measures are needed to ensure reporting value
- Outlined responsibility for strategy delivery and longevity are necessary; an expected timeframe for the strategy would be beneficial
- Reflective of & relatable to current existing strategies – further detail on how this strategy will enable and enhance other agencies and organisation to better fulfil their visions and aims.

These issues are all central to the Culture Strategy being a successful vision for all of Scotland's cultural heritage sector – the current iteration does not fully answer the concerns above.

In relation to a shorter, distilled iteration being one of the next stages in the Strategy development – whilst a reduced publication would be supported, BEFS raises additional concerns after examining the current Easy Read – A Culture Plan for Scotland Consultation. This document only exacerbates the imbalance between the primacy accorded to 'creative culture' over other forms of cultural heritage (built or natural, tangible or intangible). The two quotes below are the only references to 'history' or 'heritage' within the reduced Easy Read document.

"Culture is things like music, art, craft, dance, theatre and things that we value like the buildings and stories from history."(p1)

"Culture and being creative can help us to learn about the past and remind us about history and heritage." (p11)

If the Easy Read version chooses not to make the case for cultural heritage as an integral part of the Culture Strategy when explaining its Vision and Aims to the wider public, there is little to suggest that the Strategy, in any form, would succeed in reflecting and championing the full breadth of Scotland's cultural offer.

In answer to Question 2 more specifically:

Want: An overview of the outcomes of past culture strategies (as a supporting document, rather than being part of the body of the Strategy). It would be useful to see both the progress that a culture strategy supports, and the direction of travel supported over previous years. This would help to set context in a more concrete and measurable way.

More information about the 'national partnership for culture' – and what organisations and roles it intends to include.

Support: The view of widening the understanding of the benefits of cultural heritage, particularly in the context of connecting government sectors – essential for healthy, well-designed, inspiring places for citizens.

Dislike: The order of the ambitions throughout the document, Sustaining Culture should come first; without sustainability, 'transforming' and 'empowering' may not fulfil their potential. There is much support suggested throughout the document for smaller organisations and individuals – if they cannot be sustained, the other aims may not be realised.

Add:

Currently a paragraph on p7 reads,

Scotland is a place where healthy and distinctive communities flourish...

BEFS would prefer this to read:

Scotland is made up of places where healthy and distinctive communities flourish ...

This not only enables a clearer understanding of the importance of place as part of culture, but brings into sharper focus the uniqueness and variety of place and places which Scotland has to offer the world.

The same comment would be made of a line on p10; the change below highlights the potential for these places to have had distinctive cultural identities for a short, or historic, period of time.

Scotland's cities, towns and villages host over 200 cultural festivals each year, creating places with their own distinctive cultural identities...

Suggest a change to,

Scotland's cities, towns and villages host over 200 cultural festivals each year, celebrating places and people with their own distinctive cultural identities and traditions...

Transforming through culture

3 What is your view of the ambition, 'Transforming through culture'?

Support ambition

4 If you have further comments on the ambition, 'Transforming through culture', please provide them below. What do you like, or dislike, or what would you change?

If you have further comments on the ambition, 'Transforming through culture', please provide them below. What do you like, or dislike, or what would you change?:

Agree that highlighting the strategic potential for health, wellbeing, and education are key to sustaining and developing a strong, culturally and creatively flourishing nation; however there are concerns in regard to the messaging for this. In times of austerity with limited budgets, not everything that we currently want to achieve, can be achieved – an element of prioritisation may be necessary for culture, as for all aspects of life. To achieve the best outcomes we need to avoid alienating those who already feel 'essential services' are underfunded. Whilst there is agreement that culture can and does contribute positively to health and wellbeing – it can be difficult to demonstrate this to all. More education around the interwoven nature of these topics, as well as more funding for cultural education (of all types) in schools is supported, as is a far more vocal approach to demonstrating the economic benefits of cultural heritage to Scotland.

In relation to the skills and expertise mentioned on pp20-21, it is requested that both new and traditional skills are mentioned. Traditional skills are creative, part of our cultural heritage and essential to maintaining our historic built environment. These skills, aligned with new technologies will enable our historic buildings to continue their existence at the heart of communities – as cultural venues, hospitals, schools, museums, libraries – and places of local and national interest; inspiring and benefitting the wellbeing, health and sense of belonging for generations.

When considering the greener and more innovative future, as well as the other aspects mentioned above, planning should be mentioned within the 'Transforming through culture' section. Planning is part of a multi-disciplinary approach; an approach which not only battles inequality, but helps to form healthier, high quality, well-designed places with appropriate space and facilities for people to live, work and grow creatively and culturally. BEFS would like to see a new bullet point (p23) to highlight this aspect. If a separate bullet point under Collaboration, cooperation and policy integration cannot be accommodated - the bullet point which starts, 'Ensure cultural considerations are included ...' could be expanded to explicitly mention planning.

5 Please provide comments on the aims and actions under this ambition. What do you like, or dislike, or what would you change?

Please provide comments on the aims and actions under this ambition. What do you like, or dislike, or what would you change?:

No further comment to add to the above

Empowering through culture

6 What is your view of the ambition, 'Empowering through culture'?

Support ambition

7 If you have further comments on the ambition, 'Empowering through culture' please provide them below. What do you like, or dislike, or what would you change?

If you have further comments on the ambition, 'Empowering through culture' please provide them below. What do you like, or dislike, or what would you change?:

Change Ambition from:

Opening up and extending culture so that is of and for every community and everyone.

To:

Opening up and extending culture so that is of and for every community and individual.

On p27 there is mention to changes are necessary to how cultural engagement is measured. BEFS acknowledges there is truth in this, particularly as current measures are not particularly detailed or diverse. However, full consultation across the cultural heritage sector would need to take place to find solutions best suited to all.

P28 The ambition to meet the 'needs of all of the distinctive and diverse communities across Scotland' is laudable. However how training, funds and time will be prioritised in order to make this a worthwhile and sustainable exercise needs some unpicking.

P29 specifically mentions buildings and communities. Community Empowerment can put an onus on communities (particularly those communities who acquire heritage assets) to adequately manage and maintain these for the benefit of their communities and future generations. There is concern within the heritage community that expectations and consequences are not fully articulated, or appropriately resourced, at present. Sustainability in the long-term is key to the success of these transfers, and where responsibility lies for these assets should aspirations and reality fail to meet is central to the safeguarding of our cultural heritage. There also needs to be advice available which highlights the inherent differences between rural and urban communities in relation to these potential transfers.

8 Please provide comments on the aims and actions under this ambition. What do you like, or dislike, or what would you change?

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BEFS expresses general concern that whilst local diversification may be extremely positive, unless carefully managed could produce unintended consequences of a weakened cultural output, a reduction in audience/visitor numbers (per event/site) and ultimately fragment funding opportunities posing a real challenge to sustainability – and to the broad base of Scotland's cultural heritage offer more generally.

In relation to Aim 1 specifically – is there a plan to enable the documentation, archiving, collecting and future celebrating of this extended view of culture? For its importance to be recognised future generations need to be able to understand, research, and appreciate its (collective and individual) place as part of Scotland's cultural DNA.

Sustaining culture

9 What is your view of the ambition, 'Sustaining culture'?

Support ambition

10 If you have further comments on the ambition, 'Sustaining culture' please provide them below. What do you like, or dislike, or what would you change?

If you have further comments on the ambition, 'Sustaining culture' please provide them below. What do you like, or dislike, or what would you change?:

BEFS members have a positive and supportive view of the Ambition. To reiterate - this Ambition, whilst the least 'dynamic' is so central to how culture exists within Scotland that it should be the first Ambition within the strategy, not the last.

Highlighting the desire for greater cohesion within/across government policies is appreciated, and seen as beneficial for the wider sector, particularly in making the case for enhanced funding for cultural heritage.

Fair and inclusive representation is essential to a flourishing Scottish cultural heritage scene, able to be appreciated by all. Current funders do, rightly, push for diversity within their funding streams. However, the heritage sector suffers from (perceived and actual) multiple barriers to both employment and engagement. These need to be effectively addressed across the wider sector.

BEFS supports the implication that longer-term, more secure funding which is managed, assessed, monitored and delivered in a timely manner would be of great benefit to the sector.

The loss of EU funding and the funding gap Brexit may create for cultural heritage organisations is acknowledged within the strategy but other related Brexit issues need to be raised within the strategy in relation to sustainability.

Namely:

Issues related to freedom of movement (from built heritage construction, to specialist skills across archaeology [which in turn impacts upon infrastructure projects and home building], conservation and general skills-exchange across a broad range of professionals). How Tier 2 visas are currently assessed (income levels) is challenging for the creative and cultural sectors. The lack of cultural heritage occupations (due to the small scale of the sector) within the shortage occupations list may also prove problematic in the longer term.

Future tariff imposition on necessary materials and equipment, both timber and lime, as well as scientific materials and consumables.

Changes in farming subsidies which may well affect how land is used, and rural heritage and the environment is protected.

Potential loss of current European conventions which safeguard much of our natural heritage.

These are in addition to the potential loss of visitor numbers for all of Scotland, including events and sites as it could be perceived as more difficult (and less welcoming) to visit the UK rather than visit other EU countries.

All of these factors may seriously impact the sustainability of cultural heritage within Scotland in future years.

BEFS is delighted to see the issue of VAT discrepancy raised within the document. (p35)

The positive impact of volunteers is rightly highlighted within the strategy, but current statistics suggest this is a declining area currently. ONS showed 15% decline from 2005-2016 and the Scottish Household Survey demonstrated 4% decline from 2010-2016. The cultural heritage sector is currently reliant on a vast

number of skilled and knowledgeable volunteers. This reduction – and the potential consequences should this continue - needs to be acknowledged if the sustainability of the sector is to be maintained. This comes in tandem with the potential for longer working-lives which may further impact upon volunteer numbers in coming years as the volunteer 'supply' may be replenished less readily.

It is good to see (p37) mention of access and use of currently unused buildings. Use is crucial to the survival of our built heritage, providing inspiring spaces for a wide range of cultural activities. BEFS supports appropriate information and skills being made available to enable maximum use and potential with minimal damage to irreplaceable assets.

11 Please provide comments on the aims and actions under this ambition. What do you like, or dislike, or what would you change?

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After the issue was raised within the document (p35), it is disappointing not to see an action in relation to VAT. This is a critical issue for viability and sustainability. To preserve, conserve and use our historic built environment to achieve the best cultural outcomes for people and place; there needs to be VAT parity between new and existing buildings, for maintenance and alteration.

Delivering A Culture Strategy for Scotland

12 Please provide details of any examples of good work and best practice, from Scotland or internationally, that you think could be included in the final strategy? We are interested in a range of different approaches.

Please provide details of any examples of good work and best practice, from Scotland or internationally, that you think could be included in the final strategy? We are interested in a range of different approaches. :

The success of the strategy when finalised depends on delivery mechanisms, deliverability and the strategy having clarity and accessibility which enable it to be embedded throughout not only cultural heritage organisations, but throughout all organisations connected to production and delivery of cultural heritage.

In relation to good work, HES is already tasked with supporting the delivery of OPiT – and more information is needed as to how various extant strategies will be funded, prioritised, directed and aligned.

Whilst a role within Scottish Government to embed and mainstream the positive outcomes of Culture across government departments sounds positive, we question if this will be one-way information rather than a true dialogue process. With the intense demands and pressures on directorates with a remit which may cover healthcare, or education – what evidence is there that they are resourced to engage with culture.

13 What can you or your organisation do to support the vision, aims, ambitions and actions of the strategy?

What can you or your organisation do to support the vision, aims, ambitions:

As a strategic intermediary body, respected within the built environment sector and representing a wide range of national organisations both large and small BEFS is well placed to advise across the sector at a strategic level. BEFS regularly facilitates and mediates on issues where there is not consensus, or where there are several strands of thinking, to produce consultation responses, briefings and reports which encourage collegiate thought, original thinking and solution-based approaches. BEFS also advises and informs the sector widely in relation to new policy approaches, cascading accurate information throughout the sector via members and a widely read bulletin. BEFS will continue to advocate for the built environment's place within the cultural strategy, appreciating the acknowledgement that exists within the current document of the importance of heritage assets and place.

14 What do you think success for the strategy will look like?

What do you think success for the strategy will look like?:

A coherent government approach to cultural heritage across Scotland and throughout agencies and organisations. Where the people of Scotland are fully supported to participate in many aspects of culture and heritage, where cultural heritage is respected as a positive agent for change throughout policy environments, bringing positive benefits to education, health, wellbeing, and equality through innovative and sustainable practices.

Local Authorities empowered, engaged and resourced to support delivery of the Culture Strategy will be fundamental to success of the Strategy.

Monitoring the Impact of the Strategy

15 What is your view of the proposed approach to monitoring and evaluating the strategy set out in section 5?

Don't know

16 If you have further comments on the proposed monitoring and evaluation approach, please provide them below.

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There is concern over the potentially confusing messages in relation to monitoring and evaluation – p23 bolsters the new National Outcome in relation to culture and suggests it will, Continue to foster an outcomes-focused approach across the sectors, however p42 emphasises, The approach will avoid reducing impact evaluation to simplistic target and output indicators. Whilst outcomes and outputs are well understood to be different, there are still many cultural occurrences/sites where sheer numbers will play an important factor, and more detailed outcomes may prove intangible.

There is support for a Measuring Change Group to carefully consider this area of work – particularly in relation to what can be measured with a level of accuracy and accountability. However, the sector will be concerned over a potential change of data requirements which may result in a loss of status for current measurables. The possible consequences of new indicators would be particularly concerning in relation to funders and how the new measures might be expressed, and taken on, by those who help to sustain the sector.

Aligning the indicators for the culture strategy to the national outcome for culture is supported. However, BEFS would add that if there was alignment to the UN Sustainable Development goals this could add further weight. In relation to the built environment, the SDG is 11.4 – which does not currently align with the new Value enjoy and protect our environment NPF but does align with the culture NPF. As current indicators sit quite rightly within the environment, this may increase the level of work and indicators which those who are part of cultural heritage and the built environment currently need to fulfil for funders.

BEFS does not recognise the cultural heritage sector as currently working with simplistic targets and outputs. Current funders regularly ask for a wide range of outcomes, many of which they also require to be well-benchmarked.

Outcomes which support longer-term change and which will increase sustainability across the sector are strongly supported; particularly where they are designed to be realistic and achievable.

Other comments

17 Please use this section to provide any other comments that you wish to share about the strategy.

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BEFS is happy to provide additional information or commentary as necessary – our opening statement is included below.

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Impact Assessments

18 Do you think the partial Equality Impact Assessment has identified where the strategy might impact on people differently depending on characteristics such as age, disability, gender, race, religion or belief, sexual orientation or gender identity?

Not Answered

19 If you have further comments on the Equality Impact Assessment, please provide them below. For example, what would you add or change?

If you have further comments on the Equality Impact Assessment, please provide them below. For example, what would you add or change?:

BEFS has no comment on the impact assessments.

20 Do you think the partial Children's Rights and Welfare Impact Assessment sets out how the proposals presented in the strategy might impact on the rights and welfare of children?

Not Answered

21 If you have further comments on the Children's Rights and Welfare Impact Assessment, please provide them below. For example, what would you add or change?

If you have further comments on the Children's Rights and Welfare Impact Assessment, please provide them below. For example, what would you add or change?:

22 How do you think this strategy might impact upon people on low incomes, people living in deprived areas, people in material deprivation, people with no / or low wealth and people from different socio-economic backgrounds? Please provide comments below.

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23 Do you think the partial Business and Regulatory Impact Assessment identifies how the proposals presented in the Strategy might impact on businesses, the third (voluntary) sector or have any regulatory impact?

Not Answered

24 If you have further comments on the Business and Regulatory Impact Assessment, please provide them below. For example, what would you add or change?

If you have further comments on the Business and Regulatory Impact Assessment, please provide them below. For example, what would you add or change?:

No comment

About you

What is your name?

Name:

Ailsa Macfarlane

What is your email address?

Email:

amacfarlane@befsf.org.uk

Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:

Built Environment Forum Scotland

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response with name

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Yes

Evaluation

Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Slightly satisfied

Please enter comments here.:

Easy to access. Enough time to consult and complete. Although over Summer was perhaps not ideal timing.

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Slightly satisfied

Please enter comments here.: